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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FEDERAL EXPRESS

April 30, 1993

Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW Room 222
Washington, DC 20554

Re: Comments of Visionary Related Entertainment, Inc.
in MM Docket No. 93-45; RM 8186

Dear Ms. Searcy:

Enclosed for filing are an original and four copies of Petitioner
VREI's Comments in the above-captioned proceeding.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

)
Amendment of § 73.202(b))
Table of Allotments)
FM Broadcast Station)
Kealakekua, Hawaii)

MM Docket No. 93-45
RM 8186

To: Chief, Policy and Rules Division

COMMENTS OF VISIONARY RELATED ENTERTAINMENT, INC.

Visionary Related Entertainment, Inc. ("VREI"), by its attorney and pursuant to Sections 1.415 and 1.420 of the Commission's Rules, hereby submits its Comments in the above-captioned proceeding. As the Petitioner herein, VREI reiterates its request that the Commission amend the FM Table of Allotments (§ 73.202(b)) to substitute Channel 268C1 for Channel 268C3 at Kealakekua, Hawaii. In support thereof, the following is resubmitted:

1. VREI is the licensee/permittee of FM Radio Station KAOY, Kealakekua, Hawaii, which is classified as C3. VREI seeks to upgrade its facilities from Class C3 to Class C1.¹

2, The engineering exhibit submitted with its Petition for

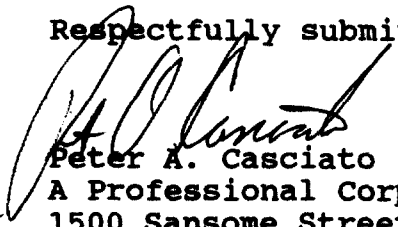
separations to other stations, allotments and known allotment proposals.

3. The substitution of the requested channel at Kealahkekua, Hawaii will serve the public interest. Amendment of the Commission's Rules Regarding Modification of FM Broadcast Licenses to Higher Class Co-channel of Adjacent Channels, 60 RR2d 113, 119 (1986). VREI hereby expresses its intention to apply for the Class C1 upgrade and construct it at a site for which it has already obtained the necessary assurance of availability, if the Commission makes this allocation change.

WHEREFORE, the premises considered, Visionary Related Entertainment, Inc. respectfully requests that the Commission amend the FM Table of Allotments, Section 73.202(b) of the Rules, as follows:

	<u>Existing</u>	<u>Proposed</u>
Kealahkekua, Hawaii	268C3	268C1

Respectfully submitted,


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April 30, 1993

Attorney for Visionary Related
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